



August 21, 2019

Notice of Ex Parte

Marlene Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: *Connect America Fund: Performance Measures for Connect
America High-Cost Universal Service Support Recipients
Docket No. 10-90; DA 17-1085***

Dear Ms. Dortch:

On August 20, 2019, the undersigned, on behalf of NTCA–The Rural Broadband Association (NTCA), visited via telephone with Suzanne Yelen of the Wireline Competition Bureau to discuss the above-captioned docket. As noted in prior filings, NTCA supports the usefulness of network testing yet recommends the Commission to ensure the protocols can be implemented in ways that are both administratively and economically efficient.

Consistent with its prior filings and *ex parte* presentations, NTCA provided an update of issues associated with implementation of the performance measurement testing rules. These issues are being identified as ISPs and their industry partners prepare for implementation and address questions regarding ordinary and exogenous events that may be encountered. These include but are not limited to: customers who decline to participate in testing; customers who disconnect, move or other terminate a subscription during a testing cycle; and, power outages or other events beyond the ISP’s control that may interfere with testing. NTCA also revisited issues raised previously and yet outstanding, including opposition to requirements to test to the IXP and the value of a “test the testing” period; the latter would contemplate a cycle during which all aspects of testing from random selection of locations, to customer interactions, to deployment of equipment, to testing and reporting data would be conducted without risk of penalty. Finally, NTCA expressed its support for comprehensive educational opportunities by which providers, counsel and management consultants can engage with the Commission to clarify the complete scope of anticipated implementational and reporting issues.

Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed with ECFS.

Respectfully submitted,

/s/ Joshua Seidemann
Joshua Seidemann
Vice President of Policy

cc: Suzanne Yelen